

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

RICHARD T. THISTLE SR.,)	
)	
Plaintiff,)	Case No. 1:22-cv-10709-ADB
)	
v.)	
)	
BACKGROUNDCHECKS.COM, LLC,)	
)	
Defendant.)	

**DEFENDANT BACKGROUNDCHECKS.COM, LLC'S REQUEST FOR AN
EXTENSION OF TIME TO FILE A RESPONSE TO PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant

Backgroundchecks.com, LLC (“BGC”), through its undersigned counsel, respectfully requests an extension of time to answer, move or otherwise respond to Plaintiff’s Complaint.

1. Plaintiff filed his Complaint in the District of Massachusetts on May 9, 2022 and served it on BGC on June 1, 2022.
2. BGC’s time to answer, move or otherwise plead expires on June 22, 2022.
3. The undersigned counsel was recently retained to represent BGC in this matter and respectfully states that it requires additional time to gather information to properly respond to Plaintiff’s Complaint. Further, BGC would like to explore the possibility of an early resolution with Plaintiff without resort to litigation.
4. BGC’s counsel attempted to contact Plaintiff’s counsel several times both by phone and email, but has not yet received a response.
5. BGC has not sought a previous extension of time from this court. The granting of this application will extend the time within which BGC may answer, move or otherwise respond to the Complaint to **July 22, 2022**.

6. The requested extension will not prejudice Plaintiff nor cause unnecessary delay in the adjudication of this case.

Respectfully Submitted,

Dated: June 21, 2022

/s/ Timothy J. Pastore

Timothy J. Pastore

John G. Papianou (*pro hac vice forthcoming*)

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*Attorneys for Defendant
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RULE 7.1(a)(2) CERTIFICATE

I certify that that prior to filing this motion, counsel for Defendant attempted to confer with Plaintiff's counsel multiple times in an attempt in good faith to resolve or narrow the issues presented by this motion, as required by Local Rule 7.1(a)(2).

Dated: June 21, 2022

s/ Timothy J. Pastore

Timothy J. Pastore

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of June 2022, I electronically filed the foregoing Motion to Extend Time to Answer, Move or Otherwise Respond to the Complaint with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel of record.

Dated: June 21, 2022

s/ Timothy J. Pastore

Timothy J. Pastore